

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) Case No. 4:14CR00187 JAR
PAMELA TABATT,)
RICHARD GROSS, and)
PAUL BERRA, JR.,)
Defendants,)
EDNA MEJIA,)
OSCAR MEJIA,)
Third-Party Petitioners.)

**UNOPPOSED MOTION FOR EXTENSION TO
RESPOND TO THIRD-PARTY PETITION**

Comes now, Plaintiff, United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Richard E. Finneran, Assistant United States Attorney for said District, and for its Motion states as follows:

1. On or about July 1, 2016, the United States of America obtained a Second Preliminary Order of Forfeiture, which included, in part, the following property (hereafter the “Subject Property”):

(a) Real Property at 114 Brookfield Boulevard, Wentzville, Missouri 63385; more particularly described as follows:

Lot 8 of Keeneland Trails Plat One, according to the plat thereof recorded in Plat Book 44 Page 45 of the St. Charles County Records, with all appurtenances, improvements and fixtures thereon;

Parcel ID: 4-0014-A221-00-0008.0000000

2. On or about September 14, 2016, Edna Mejia and Oscar Mejia filed an ancillary petition claiming ownership to the Subject Property.

3. On September 15, 2016, the Honorable Court ordered that the United States shall file a response to Edna and Oscar Mejia's petition by September 22, 2016.

4. The United States request an extension of two weeks, up to and including October 6, 2016, to respond to the petition filed by Edna and Oscar Mejia, in order to more fully review the issues at hand.

5. The United States has reviewed the instant request with Blake Hill, counsel for Petitioners, who has no objection to the instant request.

WHEREFORE, the United States respectfully request an additional two (2) weeks, up to and including October 6, 2016, to respond to Edna and Oscar Mejia's Petition for Ancillary Hearing.

Dated: September 21, 2016

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

/s/ Richard E. Finneran

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2016 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Richard E. Finneran
RICHARD E. FINNERAN, #60768MO
Assistant United States Attorney